



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 7, 2004

Amy R. Meyers, Treasurer  
Campaign for Working Families  
2800 Shirlington Road, Suite 605  
Arlington, VA 22206

**Response Due Date:**  
**May 7, 2004**

Identification Number: C00325076

Reference: March Monthly Report (2/1/04-2/29/04)

Dear Ms. Meyers:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

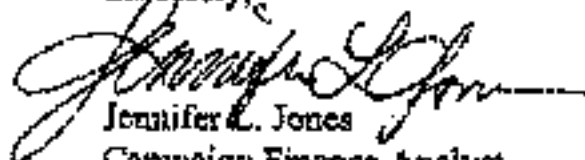
-Schedule A supporting Line 17 of your report discloses a payment from Pinnacle List Co. It appears this receipt was for goods and/or services provided by your committee. Pursuant to Advisory Opinion 1979-18, the sale/purchase price paid to a political committee could involve the receipt of a contribution from a purchaser if the purchase price exceeds the "usual and normal charge". The "usual and normal charge" for goods is defined as the price at which those goods in the market from which they ordinarily would have been purchased at the time of the contribution. Examples of goods and services include equipment, supplies, personnel, advertising services, membership lists, and mailing lists. 11 CFR §100.25(d)(1) and (2)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided and explain the steps your committee took in determining the amount charged. If your committee provided the goods and/or services at more than the usual and normal charge, the difference between the two is considered to be an in-kind contribution received by your committee from a corporation and is prohibited subject to the limits set forth at 2 U.S.C. §441b(a)

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1393.

Sincerely,



Jennifer L. Jones

Campaign Finance Analyst  
Reports Analysis Division

Exhibit C**DECLARATION OF DORIE BLACK**

1. My name is Dorie Black. I am Assistant Treasurer for Campaign for Working Families ("CWF"), located at 2800 Shirlington Road, Suite 605, Arlington, Virginia 22206. I have worked for CWF since May, 1999, or approximately five years.
2. My responsibilities at CWF include, among others, recording and organizing incoming contributions to CWF, employing CWF's best efforts to follow up with contributors in order to obtain identification information when necessary, preparing and filing CWF's required financial disclosure reports with the Federal Election Commission, and assisting in maintaining and managing CWF's mailing list.
3. CWF rents its mailing list for a charge of one hundred and fifteen dollars (\$115) per 1000 names. CWF employs a list management service, Pinnacle List Company ("Pinnacle"), to assist in renting the CWF mailing list to outside parties. CWF developed this fee in consultation with Pinnacle, and Pinnacle charges CWF a percentage of each rental fee collected for its services. CWF does not charge renting parties for any names on the rented CWF list that are identical to names that already appear on the renting party's mailing list.
4. The receipt from Pinnacle listed in CWF's Amended Year-End Report (7/1/03-12/31/03) for \$12,540.89 reflects the rental of approximately 197,120 names from CWF's mailing list, minus fees payable to Pinnacle. The receipt from Pinnacle listed in CWF's March Monthly Report (2/1/04-2/29/04) for \$12,994.29 reflects the rental of approximately 200,000 names from CWF's mailing list, minus fees payable to Pinnacle.
5. In my capacity as Assistant Treasurer, I was responsible for preparing and filing both CWF's March Monthly Report, and CWF's Year-End Report.
6. On Friday, January 30, 2004, I was preparing CWF's year-end report for electronic filing with the Commission that same day, when a power outage struck the Arlington, Virginia area - including CWF's headquarters. Access to my CWF office computer, or any other CWF computer dependant on our offices' power source, was cut off entirely. This included access to CWF's electronic filing account with the Commission, which I can only enter through CWF's computers. Soon after the power outage, the building security service ordered that the entire building be evacuated.
7. On that same day, following the power outage, I placed a telephone call to the Commission to relate CWF's circumstance and seek guidance in connection with the filing of CWF's year-end report, and spoke to a male whose first name was "Adam." "Adam" advised me to electronically file "as much as was possible" in light of the circumstances detailed above.

8. During the evening of January 30, and on January 31, 2004, I worked at my personal residence, using my home personal computer, to recreate and prepare CWF's year-end report. I electronically filed CWF's 2003 year-end report with the Commission on January 31, 2004.

9. On Monday, February 2, 2004, the power had been restored to CWF's headquarters. I prepared CWF's amended year-end report for filing on that day. I was unable to file CWF's amended year-end report on that day because, upon information and belief, the Commission's electronic filing system refused to accept a report from the CWF that amended CWF's original year-end report that had been created and electronically filed from my personal home computer.

10. I successfully filed CWF's amended year-end report electronically with the Commission on February 3, 2004.

11. On Friday, February 6, 2004, I received a call from Mr. Kenneth Lally at the Commission. Mr. Lally informed me that CWF's amended year-end report, needed to be corrected, as CWF's contributors' full names had been inadvertently listed in the "Last Name" data field.

12. I made these corrections, and the following Monday, February 9, 2004, CWF's corrected amended year-end report was electronically filed with the Commission.

13. In my capacity as Assistant Treasurer, my duties also include following up with CWF's individual contributors, when necessary, to ensure that CWF complies with federal campaign finance laws and regulations governing the collection and disclosure of individual contributor identification information.

14. I have reviewed this submission and the attachments thereto, and declare that Exhibits E-1 and E-2 are true and correct copies of a standard CWF solicitation letter and contribution form, and that Exhibit F is a true and correct copy of a typical CWF follow-up letter sent to each contributor who does not complete the identification portion of the original contribution form. CWF uses its best efforts to ensure that follow-up letters are sent within thirty (30) days of CWF's receiving the contribution that required the follow-up.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

  
Derie Black

April 14, 2004



## Campaign for Working Families

**Universe = 137,120**

Donors and Responders

**Price = \$115/M**

Exchanges available

Campaign for Working Families (CWF) is the dynamic political action committee started by former Family Research Council President, Gary L. Bauer. In one year, CWF grew to over 65,000 supporters, raised over \$3 million and became the largest pro-family, pro-life, pro-free enterprise PAC in the country. On issues ranging from fighting for religious freedom to lessening the tax burden on working families, CWF supporters defend the values upon which America was founded.

For more information please contact Anna Hargrave at Pinnacle List Company!  
(703) 379-4394 ext. 242 or [anna@pinnalistco.com](mailto:anna@pinnalistco.com)

<u>Media Available:</u>	<u>Cost:</u>	<u>Selections:</u>	<u>Cost:</u>
Mag Tape	\$25.00 F	State	\$5.00/M
E-mail	\$25.00 F	SCP	\$5.00/M
Diskette	\$25.00 F	Zip	\$5.00/M

20% commission to recognized brokers • 5,000 minimum order • 100% direct mail

Continuations: Citizen Magazine, Prison Fellowship Ministries

MY.

Dear Mr. ,

The 2004 elections are right around the corner.

As CWF prepares to elect more pro-family, pro-life candidates, I need to know if I can count on your support.

Mr. Rich, you have stood with CWF before and your past loyalty and generosity really made a difference.

But this year is different.

Last month's U.S. Supreme Court ruling on campaign finance reform limits non-profit organizations from running television or radio ads that specifically mention a candidates name within 60 days of an election.

This means that major conservative organizations, like Focus on the Family, the Christian Coalition, National Right to Life, etc., will not be able to run television or radio ads letting Americans know where members of Congress stand on partial-birth abortion or homosexual "marriage" or any other issue important to pro-family voters, if that ad is run close to an election.

But unlike those groups, Campaign for Working Families can spend money to elect or defeat candidates because we're a Political Action Committee (PAC).

CWF remains free to target those liberal politicians who oppose our values and we will do just that.

In light of the new law, wealthy liberals are already finding ways to go around the new limits. One billionaire liberal, George Soros, has pledged \$25 million to defeat Republicans. Soros even said that President Bush reminds him of the Nazis.

Soros then got another billionaire leftist, Peter Lewis, an ardent advocate of hard drugs, to promise \$12 million as a down payment on their efforts. Their goal is to raise over \$400 million to defeat the President and other Republicans and they're halfway there.

Your 2004 membership gift of \$100, \$75 or even \$50 will go

Over, please

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directly toward fighting the radical Left and their agenda to undermine our pro-family, pro-life values.

The Supreme Court decision places the burden to defend our values clearly on the shoulders of conservative political action committees, like Campaign for Working Families.

And if we are going to have any hope of countering the barrage of negative attacks ads from the radical Left, then we must redouble our efforts to raise the necessary resources now!

Please let me know if CWF can continue to count on you by sending in your 2004 Annual Membership gift today.

I started CWF back in 1996 to represent the interests and values of America's traditional families in the political arena.

Your support of CWF's programs have made a tremendous impact on preserving our American values.

And as we enter our 4<sup>th</sup> major election cycle I have high hopes for 2004.

In the first two years of operation, CWF raised over \$7 million to become the 5th largest PAC in the country. During the 1998 election cycle, CWF supported over 200 candidates for public office and 64% of our endorsed candidates for Congress won their races. In 2000, our extensive 12 state targeted GOTV program helped elect President George W. Bush. And in 2002, CWF endorsed candidates in 56 races for Congress -- we won 44 of them for a very impressive 79% win record!

CWF has the political clout needed to influence elections.

Our agenda for 2004 includes:

- Maintaining a strict screening process to ensure the candidates CWF endorses will truly represent our values. We will only support those men and women who promise to make the defense of our nation and our unborn children their top priority. Because defending innocent life -- whether on the streets of America's great cities or inside the womb -- is the first obligation of government.
- Exposing Republicans in Name Only (RINO's). CWF is not afraid to expose candidates' true opinions on the issues. We will not let them hide behind party rhetoric. We can and we will name the radicals on Capitol Hill who support

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partial-birth abortion, who refuse to defend marriage as the union of one man and one woman, and who oppose President Bush's bold actions to protect America from terrorism.

- Continuing our fight against homosexual marriage. I am constantly speaking out about the need to pass the Federal Marriage Amendment, to once and for all time define marriage as the union between one man and one woman. 2003 dealt some tough blows to traditional marriage and I hope they can be repaired in 2004.
- Maintaining and increasing our majorities in the U.S. House and Senate. The more conservatives we have in Congress, the stronger our voice will be.

As you can see, CWF will have our hands full this year.

Your continued support will help ensure that we have the resources necessary to accomplish our agenda and the added money needed to combat the liberal political action committees.

In reaction to the court decision, liberal groups are making it very clear that they intend to raise as much political money as possible. Can you imagine the millions of dollars the labor unions, the abortion industry and the militant homosexual movement will redirect toward liberal PAC's?

Not to mention the \$400 million George Soros has pledged to raise. Democrats are rallying around a hate-filled message supplied by Howard Dean, John Kerry, Dick Gephardt, Hillary Clinton and the Hollywood elites and billionaire leftists.

The liberals will do anything to retake control of the Senate or House. With the economy looking brighter and the War on Terrorism working, Democrats will set their sights on Congress, looking for any vulnerable incumbents or open seats.

We can't let them succeed.

I pray that you will stand with me again in 2004.

When I think of the influence one person can have, I am reminded of an old Aesop fable. An old man on the point of death summoned his feuding sons around him to give them some parting advice. He asked each son to break a bundle of sticks. When they could not, he told them to untie the bundle and break an individual twig. The sons got the meaning right away -- in unity there is strength.

Over, please.



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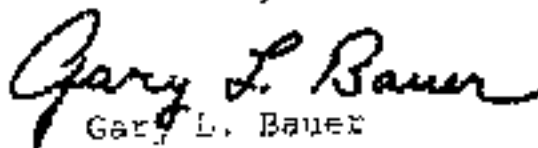
Each individual supporter of CWF matters and together we can be stronger than ever.

Every dime you send CWF will be used to help elect only pro-family, pro-life candidates.

Please take a few moments to complete the enclosed 2004 Annual Membership Renewal Statement and return it to me along with your most generous gift.

Thank you for your continued support.

Sincerely,

  
Gary L. Bauer

P.S. I can't thank you enough for all the support you've given CWF over the years. I sincerely appreciate your generosity. But we can't rest on our laurels. 2004 is a critical election year. We must ensure our conservative, pro-life, pro-family agenda is passed. Will you continue to stand with CWF in 2004? Please take a moment to complete the enclosed 2004 Annual Membership Renewal and return it to me along with your most generous gift today. Thank you. -- GLE

**Exhibit E-1**

(Front)

**2004 Annual Gift**

Date Sent

Return Receipt

Mail Code

1/8/2004

1/30/2004

H2406 25055

Description

Amount Requested

Amount Enclosed

2004 Membership Contribution

\$100 or \$50

N/A



Please see reverse for important FFC contribution information.

If you prefer to make a contribution by credit card or if you would like to make your gift by electronic transfer on a monthly basis, please provide the information on back.

Please make checks payable to:

**Campaign for Working Families**2800 Washington  
Suite 605  
Arlington, VA 22203

www.cwfpa.com

(Back)

If you wish to make your donation by credit card, please complete the information below.

Charge my: (check one) ☒ ☐ ☐

Card Number: \_\_\_\_\_

Expiration Date: \_\_\_\_\_ Amount of Gift: \$ \_\_\_\_\_

Name this appears on card: \_\_\_\_\_

Signature: \_\_\_\_\_

Paid for by Campaign for Working Families.

- Contributions to CWF are not deductible for federal income tax purposes.  
Unless otherwise prohibited, all contributions will be deposited into CWF's federal account.

Federal law requires we ask the following:

Occupation: \_\_\_\_\_ Employer: \_\_\_\_\_

May we also request the following:

Home Phone: \_\_\_\_\_ Business Phone: \_\_\_\_\_

Fax Number: \_\_\_\_\_ E-mail Address: \_\_\_\_\_

I hereby authorize the Campaign for Working Families to make a monthly deduction of \$\_\_\_\_\_ from my personal bank account. It is my understanding that this deduction will be made on the fifth of each month and I can cancel at any time with 30 days notice.

Please complete the following:

I hereby authorize the Campaign for Working Families to initiate debit entries to my checking account indicated to the right and the depository named here to debit the same to such account.

Bank Name: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Transit/ABA Number: \_\_\_\_\_

(9-digit number on lower left corner of check before account number)

Checking Account Number: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Phone Number: \_\_\_\_\_

**Campaign for****Working  
Families****A Political Action  
Committee**

Date \_\_\_\_\_

Name \_\_\_\_\_

Address \_\_\_\_\_

City, State Zip Code \_\_\_\_\_

Dear Name,

Thank you for your generous contribution to Campaign for Working Families.

As you may already be aware, federal election law requires political committees to report the name, mailing address, occupation, and employer for each individual whose contributions aggregate in excess of \$200 in a calendar year. I have provided space at the bottom of this letter for you to list your occupation and employer. Please fill out this information and return this letter to us in the enclosed, postage-paid envelope, so that we may be in compliance with federal regulations. We apologize for this inconvenience and thank you again for your assistance in this matter.

Sincerely,

*Gary L. Bauer*  
 Gary L. Bauer  
 Chairman

Gary L. Bauer  
 Chairman

Kristi Hamrick  
 President

Amy Myers  
 Secretary-Treasurer

Rachel Abrams  
 Board Member

\_\_\_\_\_  
 Address: (If different from above)

\_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Occupation: \_\_\_\_\_

Employer: \_\_\_\_\_

2600 Shirlington Road  
 Suite 805  
 Arlington, VA 22206

Phone: 703-671-8800  
 Fax: 703-671-8899

[www.cwfpac.com](http://www.cwfpac.com)

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input checked="" type="checkbox"/> Hand Delivered	Date of Receipt <i>4/16/04</i>
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<input type="checkbox"/> USPS Registered/Certified/Priority/Express Mail	Postmarked (R/C)
<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> No Postmark	
<input type="checkbox"/> Overnight Delivery Service (Specify):	Shipping Date
<input type="checkbox"/> Received from House Records & Registration Office	Date of Receipt
<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked
<i>SP</i> PREPARER	<i>4/16/04</i> DATE PREPARED

(2/2004)